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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF PARTIES'  
AMENDED JOINT PROPOSED  
PRETRIAL ORDER**

23 vs.

24 UBER TECHNOLOGIES, INC.;  
25 OTTOMOTTO LLC; OTTO TRUCKING  
26 LLC,

27 Defendants.

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1 I, Felipe Corredor, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6           I make this declaration in support of Waymo’s Administrative Motion to File Under Seal  
 7 Portions of Amended Joint Proposed Pretrial Order, filed concurrently herewith (the  
 8 “Administrative Motion”). The Administrative Motion seeks an order sealing the following  
 9 materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Amended Joint Proposed Pretrial Order	Highlighted Portions	Waymo (green highlighting)
Appendix A to Joint Proposed Pretrial Order	Entire Document	Waymo; Defendants
Appendix D to Joint Proposed Pretrial Order	Highlighted Portions	Waymo (green highlighting); Defendants (blue highlighting)

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 17       2. Specifically, the green highlighted portions of the Amended Joint Proposed Pretrial  
 18 Order and Appendix D thereto, as well as the entirety of Appendix A to the Amended Joint Proposed  
 19 Pretrial Order, contain or refer to trade secret and/or confidential business information, which Waymo  
 20 seeks to seal.

21       3. The green highlighted portions of the Amended Joint Proposed Pretrial Order, as well  
 22 as the entirety of Appendix A to the Amended Joint Proposed Pretrial Order contain, reference, and/or  
 23 describe Waymo’s trade secrets. The information Waymo seeks to seal includes the confidential  
 24 design and functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR  
 25 designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as  
 26 secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-  
 27 31). The public disclosure of this information would give Waymo’s competitors access to  
 28 descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such

1 information were made public, I understand that Waymo's competitive standing would be  
2 significantly harmed. Appendix A to the Amended Joint Proposed Pretrial Order further contains,  
3 references, and/or describes Waymo's highly confidential and sensitive business information. The  
4 information Waymo seeks to seal regards confidential details regarding Waymo's business and  
5 competition. I understand that this confidential business information is maintained by Waymo as  
6 secret. The public disclosure of this information would give Waymo's competitors access to  
7 Waymo's business strategy for its autonomous vehicle system. If such information were made public,  
8 I understand that Waymo's competitive standing would be significantly harmed.

9       4. In addition, the green highlighted portions of Appendix D to the Amended Joint  
10 Proposed Pretrial Order contain addresses of former Waymo employees involved in this case, the  
11 disclosure of which would cause Waymo and those employees substantial harm due to the high public  
12 profile of this litigation.

13       5. Waymo’s request to seal is narrowly tailored to those portions of the Amended Joint  
14 Proposed Pretrial Order and Appendices A and D to the Amended Joint Proposed Pretrial Order that  
15 merit sealing.

16       6. Waymo also seeks to seal the portions of Appendices A and D to the Amended Joint  
17 Proposed Pretrial Order as identified in the table above because Waymo believes such information is  
18 considered confidential or non-public by Defendants.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on November 21, 2017.

By /s/ *Felipe Corredor*

Felipe Corredor

Attorneys for WAYMO LLC

1                   **SIGNATURE ATTESTATION**

2                   Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
3 filing of this document has been obtained from Felipe Corredor.

4                   */s/ Charles K. Verhoeven*  
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6                   Charles K. Verhoeven

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